

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

AUTONOMOUS DEVICES LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 22-1466-MN
)	
TESLA, INC.,)	
)	
Defendant.)	
)	

MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTES

Pursuant to the Court’s oral order at D.I. 63, Autonomous Devices LLC (“Autonomous”) respectfully moves this Court to schedule a teleconference to address outstanding discovery disputes regarding the following matters:

- Tesla, Inc.’s (“Tesla’s”) refusal to provide any discovery regarding predecessor supercomputers (identified in Autonomous’ Paragraph 6(a) disclosures as accused products) in response to Autonomous’ Interrogatories and Requests for Production.
- Tesla’s refusal to produce any wiki or training documents to assist in the review of the source code and other Tesla internal technical documents (Autonomous’ Request for Production No. 35).
- Tesla’s refusal to produce documents related to the safety of the accused Full Self-Driving and Enhanced Autopilot technology (Autonomous’ Request for Production Nos. 85, 87, 88, 89).

- Tesla's refusal to respond to Autonomous' Interrogatory No. 10 seeking identification of former employees with supervisory or management roles regarding the accused technology.
- Tesla's unilateral limitation of production of relevant agreements to agreements related to autonomous driving or training a vehicle for autonomous driving (Autonomous' Interrogatory No. 8 and Requests for Production Nos. 60, 79, 80).

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (in person and/or by telephone) on the following date(s):

First Meet and Confer: June 23, 2023

Second Meet and Confer: July 24, 2023

Delaware Counsel for Plaintiff: Karen E. Keller (second meet and confer)

Delaware Counsel for Defendant: Cameron Clark (first meet and confer), Brian Egan (second meet and confer)

Lead Counsel for Plaintiff: Blair M. Jacobs

Lead Counsel for Defendant: Anish Desai (first meet and confer), Adrian Percer (second meet and confer)

The parties are available for a teleconference on August 28 and 29.

OF COUNSEL:

Blair Jacobs

Christina A. Ondrick

John S. Holley

Elizabeth Bernard

McKool Smith, P.C.

1999 K Street, NW Suite 600

Washington, D.C. 20006

(202) 370-8300

George T. Fishback, Jr.

McKool Smith, P.C.

303 Colorado Street, Suite 2100

Austin, TX 78701

(512) 692-8756

/s/ Emily S. DiBenedetto

Karen E. Keller (No. 4489)

Emily S. DiBenedetto (No. 6779)

SHAW KELLER LLP

I.M. Pei Building

1105 North Market Street, 12th Floor

Wilmington, DE 19801

(302) 298-0700

kkeller@shawkeller.com

edibenedetto@shawkeller.com

Attorneys for Autonomous Devices LLC

Dated: August 11, 2023

